

# **EXHIBIT A**

*State Court Documents*

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS FOR
COUNTY OF BEAUFORT	)	THE FOURTEENTH JUDICIAL CIRCUIT
	)	
Nancy Blanchard,	)	CASE NO.: 2020-CP-07-_____
Plaintiff,	)	
	)	
v.	)	<b>SUMMONS</b>
	)	
PETCO Animal Supplies Stores, Inc.,	)	
Defendant.	)	

TO THE ABOVE NAMED DEFENDANT:

YOU ARE HEREBY SUMMONED and requested to answer the Complaint in this action of which a copy is herewith served upon you, and to serve a copy of your Answer to said Complaint upon the subscriber at her office, 8086 Rivers Avenue, Suite A, North Charleston, South Carolina 29406, within thirty (30) days after service hereof, exclusive of the day of such service; and if you fail to answer the Complaint within the time aforesaid, the Plaintiff will apply to the Court for the relief demanded in the Complaint.

Respectfully submitted,

**WIGGER LAW FIRM, INC.**

s/Emily Hanewicz Tong  
Emily Hanewicz Tong, Esq.  
Attorney for Plaintiff  
8086 Rivers Avenue, Suite A  
North Charleston, SC 29406  
(843) 553-9800

North Charleston, South Carolina  
This 23<sup>rd</sup> day of January 2020.

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS FOR
COUNTY OF BEAUFORT	)	THE FOURTEENTH JUDICIAL CIRCUIT
	)	
Nancy Blanchard,	)	CASE NO.: 2020-CP-07-_____
Plaintiff,	)	
	)	
v.	)	<b>COMPLAINT</b>
	)	<b>JURY TRIAL REQUESTED</b>
PETCO Animal Supplies Stores, Inc.,	)	
Defendant.	)	

The Plaintiff, complaining of the Defendant, would show unto this Honorable Court as follows:

1. The Plaintiff is a citizen and resident of Effingham County, Georgia.
2. The Defendant, PETCO Animal Supplies Stores, Inc., upon information and belief, is a foreign corporation in the State of Delaware, operating by virtue of the laws of the State of South Carolina, and at all times herein operated as a business within the State of South Carolina at 1015 Fording Island Road, Bluffton, South Carolina.
3. The parties, matters and all things and matters hereinafter alleged are within the jurisdiction of this Court.

### **STATEMENT OF FACTS**

4. Plaintiff repeats and reiterates the foregoing allegations as though repeated herein verbatim.
5. On or about October 18, 2013, Plaintiff began working for Defendant company as a Grooming Associate.
6. The Plaintiff at all times was efficient and effective in her work.
7. On or about November 7, 2018, the Plaintiff noticed increased numbness and tingling in both hands, which was subsequently diagnosed as bilateral Carpal Tunnel Syndrome, arising as a direct result of her course and scope of employment with Defendant company.
8. Following Plaintiff's discovery of her injury, she reported it injury to her employer and initiated a workers' compensation claim.
9. Between November of 2018 and January of 2019, Plaintiff was repeatedly reprimanded and disciplined for baseless and unjustified reasons.
10. On January 15, 2019, the Defendant demoted Plaintiff from Grooming Salon

Manager to Pet Stylist in retaliation for filing a worker's compensation claim. The Plaintiff was allowed to keep her base salary, but her commissions were cut from 65% to 50%, representing a substantial decrease in her pay.

11. The Plaintiff was not notified in advance or in writing of this decrease in pay.

**FOR A FIRST CAUSE OF ACTION**  
**RETALIATORY DISCHARGE S.C. CODE §41-1-80**

12. Plaintiff reiterates and realleges each and every allegation as if fully set forth herein.

13. Plaintiff's demotion arose directly from her assertion of work-related injury claims.

14. Plaintiff's demotion, in fact, was retaliatory in nature for Plaintiff's bringing a workers' compensation claim in violation of the S.C. Code of Laws, §41-1-80, as amended.

15. Plaintiff's institution of a worker's compensation claim was a substantial factor in bringing about her demotion.

16. Due to the acts of Defendant, its agents and/or employees, Plaintiff is entitled to injunctive relief and/or civil damages, back wages, interest on those back wages from the date of her demotion to the present date, front pay for wages, wages she will lose in the future, and reinstatement.

17. By reason of such wrongful and retaliatory discharge by Defendant, its agents and employees, Plaintiff has been damaged in such an amount to be determined by the trier of fact.

**FOR A SECOND CAUSE OF ACTION**  
**VIOLATION OF SOUTH CAROLINA PAYMENT OF WAGES ACT**

18. The Plaintiff realleges and reiterates the preceding paragraphs as if fully set forth herein  
verbatim.

19. The Defendant failed to notify the Plaintiff of the reduction in wages, commissions and benefits, despite the seven-day written notice required pursuant to South Carolina Payment of Wages Act, South Carolina Code of Laws §41-10-30. The Defendant should be required to pay the Plaintiff for all wages owed to her, plus interest.

20. The Plaintiff is entitled to an award of damages against the Defendant in an amount to be determined by the trier of fact; also because the damages relate to wages owed to her, the Plaintiff is entitled to treble damages pursuant to the South Carolina Payment of Wages Act, South Carolina Code of Laws §41-10-80, 1976, as amended, plus attorney fees and costs.

**REQUEST FOR RELIEF**

21. The Plaintiff reiterates and realleges each and every allegation as if fully set forth herein.

22. That by reason of such wrongful acts of Defendant, the Plaintiff has been damaged in such an amount to be determined by the trier of fact.

**WHEREFORE, the Plaintiff prays for the following relief:**

A. Judgment in favor of the Plaintiff and against the Defendant for all causes of action in an amount which is fair, just and reasonable, and for compensatory damages;

B. Judgment in favor of the Plaintiff and against the Defendant with back pay and associated benefits she would have earned with all lost or diminished benefits such date to be determined by the trier of fact;

C. Judgment in favor of the Plaintiff and against the Defendant for front pay and any other work benefits she lost in an amount to be determined by the trier of fact;

D. Judgment against the Defendant, in such an amount of actual damages and any other relief this Honorable Court deems allowable under law, and just and proper;

E. Reinstatement to her former position;

F. Prejudgment interest, costs and attorney's fees as may be allowed by law; and

G. For such other and further relief as this Court deems just and proper.

**WIGGER LAW FIRM, INC.**

s/Emily Hanewicz Tong  
Emily Hanewicz Tong, Esq.  
Attorney for the Plaintiff  
8086 Rivers Avenue, Suite A  
North Charleston, SC 29406  
(843) 553-9800

North Charleston, South Carolina  
This 23<sup>rd</sup> day of January 2020.